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August 23, 2019

PRACTICE DEDICATED TO LITIGATION  
AND NEGOTIATION MATTERS

### **VIA ECF and Hand Delivery**

Hon. Eduardo C. Robreno  
James A. Byrne U.S. Courthouse, Room 15614  
601 Market Street  
Philadelphia, PA 19106-1705

**RE: *LSS v. Lyampert*  
E.D. Pa. 19-1574**

Dear Judge Robreno;

I write this letter requesting a correction of Your Honor's Order of August 20, 2019 (CM/ECF No. 44).

In my letter of August 16, 2019, advising Your Honor of the outcome of the coin-toss procedure and Plaintiff's choice of method and place for the arbitration, I indicated that Plaintiff chose JAMS as the arbitration service and "the method of arbitration under its expedited procedures." Under the tight time constraint within which I needed to send my submission to this Court, I used the word "expedited" instead of "streamlined," and respectfully request that this Court modify its Order of August 20, 2019, to reflect the use of the JAMS Streamlined Rules and Procedures.

JAMS uses two standardized sets of rules, in general, to conduct arbitration. Under the JAMS Comprehensive Arbitration Rules & Procedures (July 1, 2014), selection of an arbitrator is performed according to Rule 15 of those rules, the rule indicated by Your Honor for use in the Order of August 20, 2019. Under the JAMS Streamlined Arbitration Rules & Procedures (July 1, 2014)—the method intended and designated by the Plaintiff—selection of an arbitrator is done pursuant to Rule 12 of those rules.

**BOCHETTO & LENTZ, P.C.**

August 23, 2019

Page 2 of 2

Plaintiff thus respectfully requests that this Court modify or correct its Order of August 20, 2019, to state that the method of arbitration shall be JAMS Streamlined Arbitration Rules & Procedures and that the arbitrator shall be selected pursuant to Rule 12 of those rules.

Plaintiff also respectfully requests that the revised Order clarify that the decision of the JAMS arbitrator be final and binding on all parties pursuant to the language of Para. 12 of the LTEA.

Respectfully submitted,

**BOCHETTO & LENTZ, P.C.**

By:

George Bochetto, Esquire

cc: Judge Rueter (Via Hand Delivery)  
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